

**To:** Rao, Kate[Rao.kate@epa.gov]; Rumrill, Nancy[Rumrill.Nancy@epa.gov]  
**Cc:** Johnson, AudreyL[Johnson.AudreyL@epa.gov]; Albright, David[Albright.David@epa.gov]; Shari.Ring@cadmusgroup.com[Shari.Ring@cadmusgroup.com]  
**From:** JAMES D WALKER  
**Sent:** Mon 9/18/2017 8:12:34 PM  
**Subject:** Summary of Conference Call Discussion with Excelsior on September 15, 2017

Hi Kate and Nancy,

Below is a summary of the discussion topics on the conference call with Excelsior on September 15.

- ## Ex. 5 - Deliberative Process

Excelsior countered with a proposal to install three equally spaced HC wells at the southern boundary of the wellfield to monitor water levels and specific conductance (SC) before commencement of operations in the first year. OWs would not be installed at the southern boundary in the first year unless it was necessary to activate pumping at the HC wells after detection of an excursion at the HC wells. Monitoring SC at the intermediate monitoring wells would provide an early warning of outward movement of ISR fluids toward the southern boundary, which would require increased extraction rates at the mine block recovery wells and/or the three active HC wells at the northeastern boundary of the wellfield. Excelsior will submit a written proposal for EPA consideration of this suggestion.

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- **Timeline for EPA approval of Excelsior reports and other submittal.** Excelsior is concerned about the time required to receive EPA approvals for well drilling procedures and completion reports, well testing procedures, and other submittals that depend on EPA approval before implementation of ISR operations are authorized by EPA. The standard permit language purposely omits a timeline requirement for EPA approvals. Excelsior is seeking a 30-day approval standard, but suggested terminology such as “in a timely manner” if a specific timeline is not acceptable. EPA will consider suggestions for modification of the permit language. Excelsior will think about and suggest language that might be acceptable.

Excelsior will submit written proposals or suggestions for the three topics summarized above in an email to EPA.

There was a general discussion about the process and timeline for issuance of a draft and final permit and the public participation process.

Nancy Rumrill confirmed her plans to visit the Gunnison ISR Project site on September 21.

If you have any questions about the summary comments, please let me know.

Thanks,

Jim

